

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-Intervenors,	§	
and	§	
	§	
STATE OF NEW JERSEY	§	
	§	
Defendant-Intervenor.	§	

**DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS**

Defendant-Intervenors Karla Perez, et al. (“Defendant-Intervenors”) respectfully request that the Court grant permission to exceed the 20-page limit by 29 pages in their Memorandum of Law in Opposition to Plaintiffs’ Motion for a Preliminary Injunction. Plaintiffs made a similar Motion to File Excess Pages, which was granted (*see* ECF No. 4, 9) and on May 4, 2018, Plaintiffs filed a 49 page Memorandum in support of their Motion for Preliminary Injunction (*see* ECF No. 5). Defendant-Intervenors request these additional pages in order to present adequately their responses to the Court regarding the complex and significant issues presented in Plaintiffs’ motion. Defendant-Intervenors seek this extension for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the extension is granted.

The Plaintiffs, Defendants, and the State of New Jersey as Defendant-Intervenor do not oppose this request.

**CONCLUSION**

For the foregoing reasons, Defendant-Intervenors respectfully request that the Court grant Defendant-Intervenors' Unopposed Motion to Exceed Page Limits.

Dated: July 18, 2018

Respectfully Submitted,

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046); (SD  
of Tex. Bar No. 21127)

Attorney-in-Charge

Celina Moreno (Tex. Bar No. 24074754)  
(SD of Tex. Bar No. 2867694)

Jack Salmon (Tex. Bar No. 24068914)  
(SD of Texas Bar No. 1130532)

Alejandra Ávila (Tex. Bar No. 24089252)  
(SD of Tex. Bar No. 2677912)

Ernest I. Herrera (Tex. Bar No. 24094718); (SD of  
Tex. Bar No. 2462211)

110 Broadway, Suite 300

San Antonio, Texas 78205

Phone: (210) 224-5476

Facsimile: (210) 224-5382

Email: nperales@maldef.org

**ROPES & GRAY LLP**

Douglas H. Hallward-Driemeier  
(admitted pro hac vice)

2099 Pennsylvania Ave NW  
Washington, DC 20006-6807

Phone: (202) 508-4600

Facsimile: (201) 508-4650

Email: Douglas.Hallward-  
Driemeier@ropesgray.com

**GARCÍA & GARCÍA,  
ATTORNEYS AT LAW P.L.L.C.**

Carlos Moctezuma García  
(Tex. Bar No. 24065265)  
(SD of Tex. Bar No. 1081768)  
P.O. Box 4545  
McAllen, TX 78502  
Phone: (956) 630-3889  
Facsimile: (956) 630-3899  
Email: cgarcia@garciagarcialaw.com

*Attorneys for Defendant-Intervenors Karla Perez  
et al.*

**CERTIFICATE OF CONFERENCE**

I certify that on July 12 and 13, 2018, counsel for the parties conferred regarding the relief requested in this motion and counsel for Plaintiffs, Defendants, and the State of New Jersey as Defendant-Intervenor each indicated that they do not oppose this motion.

/s/ Nina Perales

Nina Perales

Attorney for Defendant-Intervenors

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on July 18, 2018, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales

Attorney for Defendant-Intervenors

